## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DISTRICT

GREGG OWEN,	)
Petitioner	)
	) No. 07 C 6027
v.	) Judge Gettleman
	)
TARGET MEDIA PARTNERS	)
OPERATING COMPANY,	)
	)
Respondent.	)

## PETITIONER'S MOTION FOR ENTRY OF FINAL JUDGMENT

Petitioner Gregg Owen ("Owen"), through his attorneys, Edward T. Joyce & Associates, P.C., respectfully moves for entry of final judgment pursuant to 9 U.S.C. §§9 and 13 and Rule 58. In support of this motion, Owen states as follows:

- 1. On October 24, 2007, Owen filed his Petition for Confirmation of Final Arbitration Award ("Petition"). (A copy of Owen's Petition is attached hereto as Exhibit A.)
- 2. On December 13, 2007, this Court entered a minute entry affirming the arbitration award. (See Exhibit B.)
- 3. Pursuant to the Federal Arbitration Act and the parties' arbitration agreement, Owen is entitled to receive a judgment that has the same force and effect as a judgment entered in an action originally filed before the court. 9 U.S.C. §§ 9 and 13 and Ex. A at¶ 6.
  - 4. Although this Court entered a minute entry, it has not yet entered a judgment.
  - 5. Rule 58 requires that every judgment "be set out in a separate document." F.R.C.P. 58.
- 6. In addition, the Federal Arbitration Act provides that "the judgment [entered upon confirmation of an arbitration award] shall be docketed as if it was rendered in an action." 9 U.S.C. § 13.

7. Thus, pursuant to Rule 58 and 9 U.S.C. § 13, Owen respectfully requests that this Court enter a judgment consistent with the findings set forth in the arbitration awards that were confirmed on December 13, 2007. Copies of the arbitration awards are attached to Owen's Petition (Exhibit A hereto) as Exhibits 3 and 6 to Owen's declaration in support of his Petition. For the Court's convenience, Owen has attached hereto a proposed form of judgment as Exhibit C.

Dated: May 7, 2008 Respectfully submitted, **GREGG OWEN** 

> By: /s/ Robert D. Carroll One of his attorneys.

Edward T. Joyce Robert D. Carroll EDWARD T. JOYCE & ASSOCIATES, P.C.

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